OFAC's Office of Enforcement Data Delivery Standards

This document describes the technical requirements for the preferred format in which to submit electronic document productions to the Office of Foreign Assets Control's Office of Enforcement ("Enforcement") for those who submit their documents electronically. If you are unable to provide your electronic document production in the format outlined below or have questions regarding the preferred format requirements, please contact Enforcement (see Section I, paragraph 9, below). At present, Enforcement uses Concordance v10.012 and Concordance Image v5.09.

The general instructions for submitting document productions to Enforcement in the preferred format are set forth, below, in Section I. More specific instructions are provided in Sections II through V with respect to paper documents, email collections, native files, and optional formats.

I.   General Instructions:

1) Provide a cover letter with each package submission which includes the Bates range and a general description of the documents and/or the custodian(s). The cover letter must also summarize the number of records, images, emails and attachments in the submitted package.

2) Produce documents in the same form that they were created or maintained. Documents created or stored electronically should not be produced in hard copy. The document format must remain the same as the original. If the original file is a text file, it should not be converted to a PDF file but must remain in a text file format.

3) Deliver data on CDs, DVDs, or hard drives. The smallest number of media devices needed to deliver the data is recommended.

4) Label all media submitted with, at least, the following information:
   a. Case number,
   b. Submission date,
   c. Bates range, and
   d. Number of CDs, DVDs, or hard drives (if applicable).

5) If records are being submitted by multiple custodians, organize all submissions by custodian unless otherwise instructed.

6) Provide all submissions free of computer viruses.

7) Provide in a separate letter all passwords for documents, files, or compressed archives provided in the submission.

8) Overview of preferred formats for package submission:
   a. Paper Documents - Scanned paper converted/processed to TIFF Files. Must be Bates-numbered and must include OCR text for all of the files submitted. (See Addendum #1 for data field requirements.)

b. Email Collections - Electronic mail converted/processed to TIFF files for emails and attachments. Must be Bates-numbered, must include a link to the email or native file, and must include all text relevant to the submission.

c. Native Files - Electronic documents converted/processed to TIFF files. Must be Bates-numbered, must include a link to the native file (this would be Word, Excel and .PDF files), and must include the full text.

d. PDF Files – All PDF Documents must be Bates-numbered and must include OCR text searchable within Concordance. (See Section V, Optional Format, below.)

9) For any issues that require further clarification, please contact Enforcement. If you are making an electronic production in connection with an open investigation, please contact the Enforcement Officer handling your case directly. For all other productions, contact Enforcement at the following email address: OFACEnforcement@treasury.gov. Write "Electronic Document Production" in the email subject line, and include in the email your name and, if applicable, the name of the company or organization on whose behalf you are acting, as well as your phone number and any other relevant contact information.

II.   Paper Documents:

1) Image files. Images must be CCITT 6.0 (Group 4 Compression) TIFF files (single or multi-page files). All images must be Bates-numbered. The number of files per folder must be limited to 1,000 files. Each group of files must have a "load" file included to allow manual uploading of the image files into Concordance (if necessary); this image "load" file must be in the standard .OPT or .LOG file format used by Concordance to upload image references into a Concordance Image database.

2) Delimited text files (also known as .DAT Files). At a minimum, this file must contain an IMAGEID field (image key used to reference images in Concordance Image). The image key must be unique, fixed length, and CANNOT be the Bates number of the document. If you change the length of the image key in a subsequent submission, the submission will be rejected. Bates numbers (endorsed on the documents and included in the delimited text file) MUST be delivered in a consistent manner for sorting purposes. For example, if the first submission delivered is Bates stamped ABC-0000001-ABC-0005267, subsequent submissions with the same prefix must have the same format (spaces, dashes, etc.) and the same number of digits. For example, ABC 0005268, ABC0005268 or ABC-00005268 is not acceptable. The delimited text file must also include a header record. (See Addendum #1 for data field requirements.)

The delimiters for the file must be as follows:
    Comma: ASCII character 20
    Quote: ASCII character 254
    Newline: ASCII character 174

3) OCR text. The OCR text provided to Enforcement may be delivered two ways. (1) The OCR text may be delivered as multi-page ASCII files. The name of the file must match the IMAGEID field. (2) The OCR text may be included in the delimited text file (OCRTEXT field). If possible (regardless of delivery method), please place page markers at the beginning or end of each OCR text page as shown:

   *** LA000001 *** (example)

   The data surrounded by *** is the Concordance Image IMAGEID.

4) Concordance Image cross-reference file. The Concordance Image cross-reference file is a comma-delimited file consisting of six fields per line. There must be a line in the cross-reference file for every image in the database. The format for the file is as follows:
   a. IMAGEID: The unique designation that Concordance and Concordance Image use to identify an image.
   b. VolumeLabel: Optional.
   c. ImageFilePath: The file path to the image file.
   d. DocumentBreak: If this field contains the letter "Y," this is the first page of a document. If this field is blank, this page is not the first page of a document.
   e. FolderBreak: Leave empty.
   f. BoxBreak: Leave empty.
   g. PageCount: Optional.

III.   Email Collections:

Preferred Format: Delimited text files with images and native attachments:

1) Image files. The producing party will provide a TIFF image for each page of an email and attachment(s). Images must be CCITT 6.0 (Group 4 Compression) TIFF files (single or multi-page files). All images must be Bates-numbered. The number of TIFF files per folder must be limited to 1,000 files. Refer to the Paper Documents section for Bates and image key numbering rules. (Please see Section II, paragraph 1, above, for configuration of the accompanying "load" file for the images.)

2) Native attachment files. The producing party will provide a copy of the email and native attachment files. The number of native files per folder must be limited to 1,000 files.

3) Delimited text files (also known as .DAT files). The text and metadata of the email and the attachment(s) must be extracted, entered in the appropriate fields, and provided as an ASCII delimited text file. The email will be the "parent" and the attachment(s) will be the "child." An email may have more than one child. The child attachment's Bates number(s) must be listed in the parent email's coded fields under CHILD_BATES. If there is more than one attachment, list the first Bates number of each attachment and separate each by a semi-colon (";"). The parent email's Bates number(s) must be listed in the child(s) attachment(s) under PARENT_BATES. The

child/children must immediately follow the parent record. The delimited text file must include a header record. (See Addendum #1 for data field requirements.)

The delimiters for the file must be as follows:
Comma: ASCII character 20
Quote: ASCII character 254
Newline: ASCII character 174

4) Full text. When the full text is not provided in the ASCII delimited text file or if text exceeds 12MB in the "text" field, text files may be delivered as multi-page ASCII files. The name of each file must match the image key field. Any document in which text cannot be extracted must be OCR'd, particularly any PDFs without embedded text.

5) Concordance Image cross-reference file. The Concordance Image cross-reference file is a comma-delimited file consisting of six fields per line. There must be a line in the cross-reference file for every image in the database.

We will also accept the following formats:
PST - a personal storage file native to Microsoft Outlook. You must provide any necessary passwords or decryption.

IV.   Native Files (to include Excel Spreadsheets and Word Document Files):

Preferred Format: Delimited text with images and links to native files:

1) Image files. Provide a TIFF image of the native files. Images must be CCITT 6.0 (Group 4 Compression) TIFF files (single or multi-page files). All images must be Bates-numbered. The number of TIFF files per folder must be limited to 1,000 files. (Please see Section II, paragraph 1, above, for the configuration of the accompanying "load" file for the images.)

2) Native files. Provide a copy of the native files. The number of native files per folder must be limited to 1,000 files.

3) Delimited text files (also known as .DAT files). An ASCII delimited file containing the metadata associated with the file, text extracted from the native file, and a directory path to the native file. The delimited text file must include a header record.

The delimiters for the file must be as follows:
Comma: ASCII character 20
Quote: ASCII character 254
Newline: ASCII character 174

4) Full Text. When the text file is not provided in the ASCII delimited text file or if text exceeds 12MB in the TEXT field, the text file may be delivered as multi-page ASCII files. The name of the file must match the image key field. Any document in which

text cannot be extracted must be OCR'd, particularly any PDFs without embedded text.

5) Concordance Image Cross-Reference file. The Concordance Image cross-reference file is a comma-delimited file consisting of six fields per line. There must be a line in the cross-reference file for every image in the database.

V.   **Optional Format:** (if .PDF files are submitted)

PDF files may be delivered in folders named by Custodian.

If PDFs are delivered, all PDF files must meet the following requirements:

1) Each PDF file must represent a discrete document; a single PDF cannot contain multiple documents.

2) All PDFs must contain embedded text to include all discernible words within the document, not selected text.

3) If Bates-numbered, each PDF file name will consist of the Bates range, and each file must include ALL document text contained within that range.

4) All PDF files submitted must be OCR'd and have an image-quality resolution of no less than 300dpi (dots per inch).

Addendum #1: Data Field Requirements

	Data Field Name:	Description:	Example:
1*	BEGNO	First Bates number	ABC-0000001
2*	ENDNO	Last Bates number	ABC-0000250
3	BEGATTACH	First Bates number for any attachments	ABC-0000025
4	ENDATTACH	Last Bates number for any attachments	ABC-0000029
5*	PAGECOUNT	Number of total pages per document	249
6*	AUTHOR	The author of the document	Jon Doe
7*	CREATEDATE	The original creation date of the document	02/27/2013 (MM/DD/YYYY Format)
8*	DOCTYPE	The type of document	TEXT or PDF or EMAIL

* Required field for entry into Concordance database